

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CELLULAR COMMUNICATIONS
EQUIPMENT LLC,

Plaintiff,

v.

HMD GLOBAL OY,

Defendant.

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Case No. 2:20-CV-00078-JRG

JURY TRIAL DEMANDED

**DECLARATION OF GABRIEL A. PEIXOTO IN SUPPORT OF OPPOSITION BY
DEFENDANT HMD GLOBAL OY TO MOTION FOR EXPEDITED DISCOVERY AND
TO EXTEND TIME TO RESPOND TO MOTION TO TRANSFER VENUE**

I, Gabriel A. Peixoto, hereby declare under 28 U.S.C. § 1746:

1. I am an attorney licensed to practice in the State of California, and an associate at the law firm of Warren Lex LLP, counsel for defendant HMD Global Oy. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, I could and would testify competently to each of them.

2. On September 27, 2020, counsel for Cellular Communications Equipment LLC sent counsel for HMD Global a letter requesting “the following expedited discovery: eight interrogatories and eight requests for production each to HMD and HMD America, and 25 total hours of depositions,” including depositions of each declarant and “a 30(b)(6) deposition of both HMD and HMD America.” The September 27 letter further stated that, “[a]s for timing and scheduling, CCE proposes that all responses to interrogatories and production of documents in response to RFPs be provided within fourteen days after service, and that expedited discovery be

complete within forty-five days. CCE proposes that the deadline to respond to HMD's venue motion be fourteen days after expedited discovery closes."

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 14, 2020, in Berkeley, California.



Gabriel A. Peixoto